



Klimcsak.Raymond@epamail .
epa.gov

07/22/2005 10:33 AM

To "Jones, Sally" <S.Jones@WestonSolutions.com>
mlcapichioni@sherwin.com, hmartin@elminc.com, "Clough,
Stephen R." <Steve.Clough@WestonSolutions.com>,
cc "Fischer, Arthur" <Arthur.Fischer@WestonSolutions.com>,
Lynn.Arabia@tteci.com

bcc

Subject Re: Response to Comments on Background Sampling

Sorry everyone that it has taken me awhile to get back to all of you on Weston's (and SWC) response to EPA's comments. I would like to just add a comment on Sally's response, specifically #3, below.

Although it is stated within NJDEP's Technical Requirements for Site Remediation that a minimum of 10 background samples should be collected, I would like to add that their guidance also states (and I don't have the specific language in front of me) - that the specific geological layers/units which are encountered (i.e., soil types) should be sampled as well. I would interpret this language to mean, that some of the some background samples (physically) would be comparable in nature to those samples which will be collected from within U.S. Ave. Burn and the Rt. 561 Dump Site (i.e., those not collected along the specific transects) and that another percentage of soil samples should be collected from an environment similar to those near the creeks.

Although we will have specific geological information, in the form of soil logs generated from the monitoring well installation procedures, the sampling program is not set up in this fashion. Rather I would suggest that the existing protocols, which are provided in Addendum #1 be utilized. Specifically, I would recommend that the sampling procedures for within the ?fenced-in areas? (i.e., U.S. Ave. Burn and Rt. 561 Dump Site) be utilized, and that an equal number samples be located upland and near creeks be selected.

thanks,
Ray

Ray Klimcsak
Remedial Project Manager
U.S. EPA, Region 2
ERRD - New Jersey Projects/State Coordination Team
New York, NY 10007
phone: (212) 637-3916

-----"Jones, Sally" <S.Jones@WestonSolutions.com> wrote: -----

To: Raymond Klimcsak/R2/USEPA/US@EPA
From: "Jones, Sally" <S.Jones@WestonSolutions.com>
Date: 06/27/2005 03:42PM
cc: mlcapichioni@sherwin.com, hmartin@elminc.com, "Clough, Stephen R."
<Steve.Clough@WestonSolutions.com>, "Fischer, Arthur" <Arthur.Fischer@WestonSolutions.com>
Subject: Response to Comments on Background Sampling

Ray -

Clarification needs to be provided as to the precise number of sediment samples being proposed. In addition, any changes or addition to the number and locations of the proposed sediment samples must be provided in a new figure.

b. It is stated that "Since most of the surface water samples collected in the sub-sites will be from stream environments, rather than lakes, SWC proposes to collect surface water samples from stream environments." However, there are a total of approximately 12 surface water samples scheduled for collection from Bridgewood and Kirkwood lakes, it must be clarified whether it is the intent of SWC to use the background data from the surface water collection activities (stream environment) and compare it to the those surface water samples from the two lakes. If so, it is recommended that additional samples be collected from a "lake" environment.

c. Background soil samples are proposed from two distinct depths (i.e., 0-24" and 0-6" above water table); however, the sampling scheme should follow the sampling depth intervals as defined by SWC in their June 9, 2004 Addendum #1 (to the 2003 Work Plan). This would require that if the groundwater is greater than 4", then samples are collected from 3 distinct intervals.

Mary Lou - I am off tomorrow, and this time will not be near a computer - so if there is a need to have a conference call and discuss any details, I will be available on Monday. If we don't speak today, have a good weekend.

ps - if someone could let Art know I am running late (tough leaving the office when you come in), I'll most likely be down sometime around 9.

thanks,
Ray

Ray Klimcsak
Remedial Project Manager
U.S. EPA, Region 2
ERRD - New Jersey Projects/State Coordination Team
New York, NY 10007
phone: (212) 637-3916

[attachment "01846background_loc.pdf" removed by Raymond Klimcsak/R2/USEPA/US]



Klimcsak.Raymond@epamail.
epa.gov

07/12/2005 10:54 AM

To LArabia@TtFWI.com

cc

bcc

Subject Fw: Response to Comments on Background Sampling

do you see any problem with Sally's proposal? Not sure about her answer to #3?

Plus, when it comes to the lake environment...sounds like something we will need to possibly revisit.

Finally, I would include in my response that the locations may be "flexible" in their exact locations.

Ray

----- Forwarded by Raymond Klimcsak/R2/USEPA/US on 07/12/2005 10:53 AM

"Jones, Sally"
<S.Jones@WestonSolutions.com>

06/27/2005 03:42
PM

To
Raymond Klimcsak/R2/USEPA/US@EPA
cc

mlcapichioni@sherwin.com,
hmartin@elminc.com, "Clough,
Stephen R."
<Steve.Clough@WestonSolutions.com
>, "Fischer, Arthur"
<Arthur.Fischer@WestonSolutions.com>

Subject
Response to Comments on
Background Sampling

Ray -

1. We apologize for the confusion of the map submitted with the Technical Memo. My copy had the correct map, so who knows what happened. I have attached the correct figure. As discussed, I will send you a large one via fed ex tonight.

2. With regards to background samples in surface water, we have proposed focusing sediment and surface water samples in stream environments since the vast majority of the samples to be collected during the Strategic Sampling RI will be from streams. It may be

necessary to evaluate background lake conditions in the future, but we would prefer to more fully characterize Bridgewood Lake and upper reaches of Kirkwood Lake (the portion which is in our current study area) prior to determining that need. Only a few samples have been taken in each water body to date. Also, the type of lakes we would select for background would be driven by the ecological habitat study and risk assessment goals. It is important to compare similar biologic communities. We would need to move down the ecological assessment path prior to finalizing a scope of work for background sampling in lake environs.

3. Regarding the depth of soil sampling for background, the only guidance/regulation that speaks specifically to background depths is the NJDEP Technical Requirements for Site Remediation 7:26E. This regulation cites from 3.10.3

"A minimum of 10 background samples shall be collected from onsite or in the region of the site. Two samples shall be collected from each of five locations with one sample collected at a depth of zero to six inches and one sample at a depth of greater than 12 inches at each location".

Our current strategy of collecting a sample from 0-6" bgs and 6 inches above the water table satisfies this requirement. These two samples should provide sufficient information for background comparison.

Sally

-----Original Message-----

From: Klimcsak.Raymond@epamail.epa.gov
[mailto:Klimcsak.Raymond@epamail.epa.gov]
Sent: Thursday, June 16, 2005 7:28 AM
To: mlcapichioni@sherwin.com
Cc: hmartin@elminc.com; Clough, Stephen R.; Jones, Sally;
LArabia@TtFWI.com
Subject: Draft Comments on Background sampling

Hi Mary Lou,

I am going to provide you with the remaining questions/concerns that the EPA has with the SWC's May 2005 Tech Memos. I thought, since it was productive that we discussed EPA's concerns prior to submitting our final comments, it would be more beneficial to do the same with the remaining issues. Specifically, I am going to include the agency's concerns with the SWC May 10, 2005 - "Proposed Scope of Work - Background Sampling Investigation".

a. Sediment sample collection activities are proposed from 10 locations; however, only 5 locations are shown in Figure 1. Clarification needs to be provided as to the precise number of sediment samples being proposed. In addition, any changes or addition to the number and locations of the proposed sediment samples must be provided in a new figure.

b. It is stated that "Since most of the surface water samples collected in the sub-sites will be from stream environments, rather than lakes, SWC proposes to collect surface water samples from stream environments." However, there are a total of

approximately 12 surface water samples scheduled for collection from Bridgewood and Kirkwood lakes, it must be clarified whether it is the intent of SWC to use the background data from the surface water collection activities (stream environment) and compare it to the those surface water samples from the two lakes. If so, it is recommended that additional samples be collected from a "lake" environment.

c. Background soil samples are proposed from two distinct depths (i.e., 0-24" and 0-6" above water table); however, the sampling scheme should follow the sampling depth intervals as defined by SWC in their June 9, 2004 Addendum #1 (to the 2003 Work Plan). This would require that if the groundwater is greater than 4", then samples are collected from 3 distinct intervals.

Mary Lou - I am off tomorrow, and this time will not be near a computer - so if there is a need to have a conference call and discuss any details, I will be available on Monday. If we don't speak today, have a good weekend.

ps - if someone could let Art know I am running late (tough leaving the office when you come in), I'll most likely be down sometime around 9.

thanks,
Ray

Ray Klimcsak
Remedial Project Manager
U.S. EPA, Region 2
ERRD - New Jersey Projects/State Coordination Team
New York, NY 10007
phone: (212) 637-3916



(See attached file: 01846background_loc.pdf) 01846background_loc.pdf



Klimcsak.Raymond@epamail.
epa.gov

06/16/2005 07:27 AM

To mlcapichioni@sherwin.com

cc hmartin@elminc.com, steve.clough@westonsolutions.com,
s.jones@westonsolutions.com, LArabia@TtFWI.com

bcc

Subject Draft Comments on Background sampling

Hi Mary Lou,

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a. Sediment sample collection activities are proposed from 10 locations; however, only 5 locations are shown in Figure 1. Clarification needs to be provided as to the precise number of sediment samples being proposed. In addition, any changes or addition to the number and locations of the proposed sediment samples must be provided in a new figure.

b. It is stated that "Since most of the surface water samples collected in the sub-sites will be from stream environments, rather than lakes, SWC proposes to collect surface water samples from stream environments." However, there are a total of approximately 12 surface water samples scheduled for collection from Bridgewood and Kirkwood lakes, it must be clarified whether it is the intent of SWC to use the background data from the surface water collection activities (stream environment) and compare it to the those surface water samples from the two lakes. If so, it is recommended that additional samples be collected from a "lake" environment.

c. Background soil samples are proposed from two distinct depths (i.e., 0-24" and 0-6" above water table); however, the sampling scheme should follow the sampling depth intervals as defined by SWC in their June 9, 2004 Addendum #1 (to the 2003 Work Plan). This would require that if the groundwater is greater than 4", then samples are collected from 3 distinct intervals.

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ps - if someone could let Art know I am running late (tough leaving the office when you come in), I'll most likely be down sometime around 9.

thanks,
Ray

Ray Klimcsak
Remedial Project Manager



The Sherwin-Williams Company
Environmental, Health & Regulatory Services
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115-107N
Facsimile: (216) 566-2730

May 10, 2005

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Proposed Scope of Work – Background Sampling Investigation
RI/FS Activities - Gibbsboro, New Jersey

Dear Mr. Klimcsak:

As required by the approved November 2003 Gibbsboro Remedial Investigation/Feasibility Study (RI/FS) Work Plan, and as discussed at our April 28, 2005 meeting, Sherwin-Williams is proposing a scope of work for background sampling. We plan to complete background sampling for sediment, surface water and soil during the initial implementation sequence sampling.

Sherwin-Williams has reviewed U.S. Environmental Protection Agency (EPA) guidance on assessing background contaminant concentrations in Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) projects. In particular, the following EPA documents were relied on in our evaluation and seem to be the most applicable to Gibbsboro, New Jersey site.

1. EPA. 1989. Risk Assessment Guidance for Superfund Volume I, Human Health Evaluation Manual (Part A), Section 4.4. Office of Emergency and Remedial Response. (RAGS Part A).
2. EPA. 2002. Memorandum-Transmittal of Policy Statement: "Role of Background in the CERCLA Cleanup Program" OSWER 9285-07P.
3. EPA. 2001. Guidance for Characterizing Background Chemicals in Soil at Superfund Sites – External Review Draft – OSWER 9285.7-411.

RAGS Part A, Section 4.4.2, defines background samples as "samples collected at or near the hazardous waste site in areas not influenced by site contamination. They are collected from each medium of concern in these offsite areas. The locations of background samples must be in areas that could not have received contamination from the site, but that do have the same basic characteristics as the medium of concern at the site."

EPA's 2001 guidance, Section 1.5, defines background as "those collected at or near the hazardous waste site in areas not influenced by the Superfund site contamination or other nearby Superfund sites. Background soil samples should have the same basic

characteristics as the site sample. Background substances may be natural or manmade.”

In addition, New Jersey Department of Environmental Protection (NJDEP) Technical Requirements for Site Remediation 7:26E-3.10 was reviewed. This regulation provides specific guidance for the collection of soil samples; however, it does not discuss background sampling for sediment or surface water. The regulation cites the following:

3.10 – Site Investigation – Background Investigation in Soil

i. A minimum of 10 background samples shall be collected from onsite or in the region of the site. Two samples shall be collected from each of five locations with one sample collected at a depth of zero to six inches and one sample at a depth of greater than 12 inches at each location;

ii. Background samples shall be collected at locations unaffected by current and historic site operations as documented by the preliminary assessment, including aerial photographs. Wherever possible, background samples shall be collected from locations which are topographically upgradient and upwind of contaminant sources.

Given the guidance reflected in the EPA and NJDEP documents, we have developed a proposed scope of work for background sampling. Sherwin-Williams plans to focus the background sampling in the watersheds that enter the uppermost reaches of the study area from the east. There are three watersheds that enter the upper reaches of the study area:

1. A series of lakes and streams that enter Silver Lake, immediately upstream of The Paint Works.
2. A series of lakes and streams that enter Clement Lake, immediately upstream of the Dump Site.
3. The headwaters of Honey Run which originate approximately ½ mile southeast and upstream of the Burn Site.

The proposed background sampling investigation focuses on collecting representative sediment, surface water and soil samples from these three watersheds.

The attached Figure 1 entitled Proposed Background Locations provides the proposed locations, by media, for the background sampling investigation.

Surface Water

A total of five surface water locations have been proposed. One is located in the Silver Lake watershed, two in the Clement Lake watershed and two in the Honey Run watershed. These locations are all located within stream channels. Since most of the surface water samples collected in the sub-sites will be from stream environments, rather than lakes, Sherwin-Williams proposes to collect the background surface water samples from stream environments.

Two rounds of surface water samples will be collected and will coincide with the collection of surface water in the sub-sites, which are planned during the initial implementation sampling sequence. As per the approved 2003 Work Plan, one sampling event will coincide with a dry period and one will coincide with a wet period. These events are tentatively planned for August and September 2005, respectively, but are dependent on weather conditions.

As a result, a total of 10 surface water samples will be collected. All samples will be analyzed for Target Analyte List (TAL), Target Compound List (TCL), Total Organic Carbon (TOC), pH, and hardness parameters.

Sediment

Sherwin-Williams proposes to collect sediment samples from 10 locations, five of which coincide with the surface water locations. Consistent with the sediment sampling being conducted as part of the approved 2003 Work Plan, two samples will be collected from each of the 10 locations. One will be collected from a depth of 0-6 inches below ground surface (bgs), and the second sample will be collected from a depth of 18-24 inches bgs. Sampling techniques will be consistent with those used at the sub-sites (Encore sampling is currently planned).

A total of 20 sediment samples will be collected from the 10 sample locations. All samples will be analyzed for TAL, TCL, TOC, and grain size distribution.

Soil

Ten locations are proposed for soil sampling. Three are located in the Silver Lake watershed, three are located in the Clement Lake watershed and four are located in the Honey Run watershed.

Two samples will be collected from each location, consistent with the approved 2003 Work Plan. One sample will be collected from a depth of 0-24 inches bgs and one from a depth of 0-6 inches above the water table.

A total of 20 soil samples will be collected. All samples will be analyzed for TAL and TCL analysis.

As per the approved 2003 Work Plan, Sherwin-Williams has conducted the prerequisite steps which include performing reviews of NJDEP's Known Contaminated Sites and EPA's RCRA facilities listings to confirm that these proposed locations were not identified. In addition, Sherwin-Williams proposes to meet EPA in the field to inspect the areas and select final locations.

As per the EPA guidance documents cited previously, the data collected during the initial implementation sequence sampling and the background investigation will be compared. Evaluations will be performed to determine whether there is a "statistically significant difference" between the two data sets (on site vs. background). Sherwin-Williams intends to follow EPA guidance, in particular EPA RAGS which provides guidance on how to implement this evaluation, including how to determine what is "statistically significant". It is anticipated that the number of samples collected will be sufficient to conduct this analysis.

We plan to begin the background sampling at the end of July 2005, and we will coordinate scheduling a site visit prior to that time in order to verify sample locations. If you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,

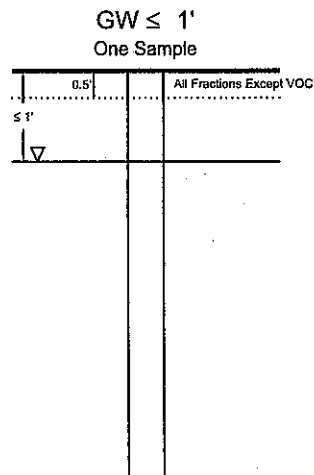
Mary Lou Capichioni
Director Remediation Services

Attachment

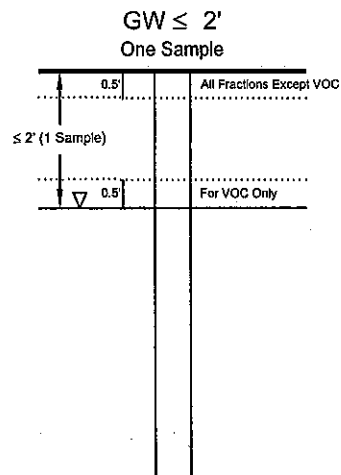
Cc: H. Martin, ELM
S. Jones, Weston
S. Clough, Weston

Soil Sampling Profiles ⁽¹⁾ Based on Depth

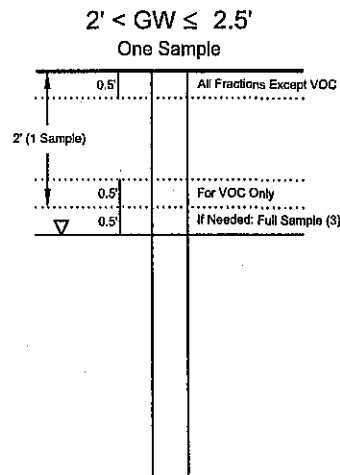
Scenario 1a ⁽²⁾



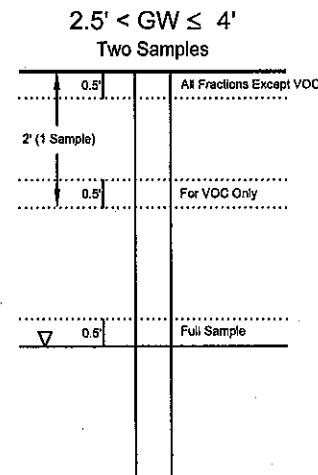
Scenario 1b



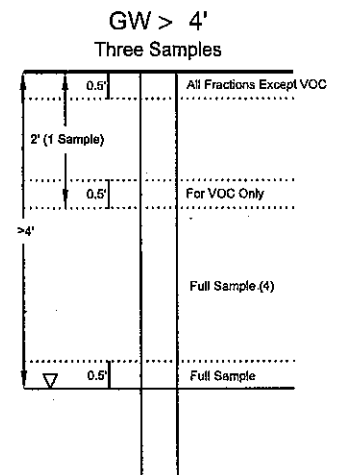
Scenario 2a



Scenario 2b



Scenario 3

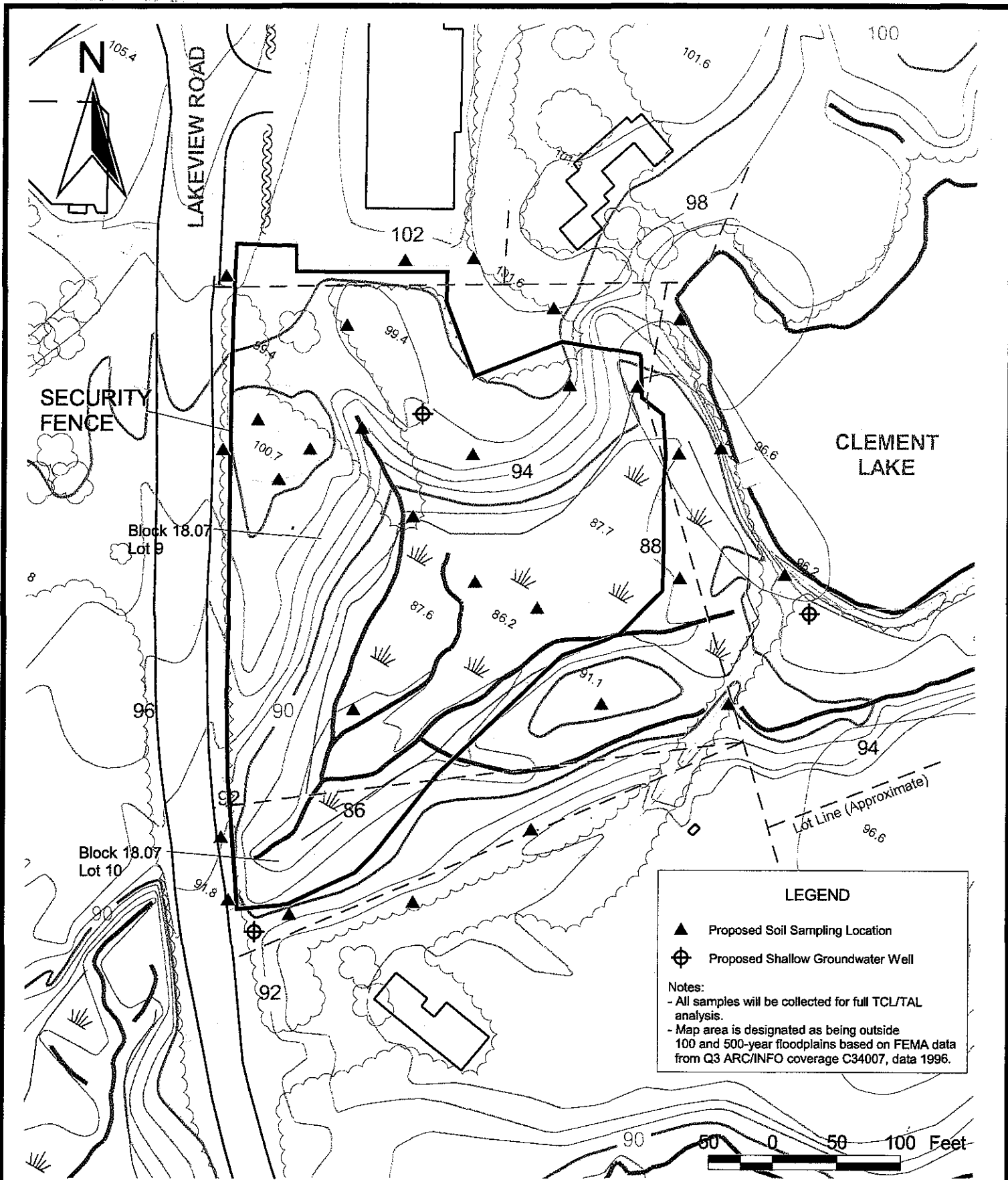


Notes:

1. These Scenarios only apply to the areas beyond the fence lines at the US Avenue Burn Site, Dump Site, and past West Clementon Road along Hillard Creek.
2. If Scenario 1a is occurring repeatedly, consult with Field Manager for additional guidance.
3. No samples will be collected below 2.0' unless evidence of contamination is observed. If contamination is present, additional sampling will be performed below it in order to delineate.
4. Sample interval will be biased towards material showing evidence of contamination (color, odor, PID, etc.). If no evidence is present, sample will be collected at the intervals midpoint.

LEGEND:		TITLE:	
		Soil Sampling Profiles Based on Depth To Groundwater	
PROJECT:			
Gibbsboro RI/FS			
CLIENT NAME:		DATE:	
Sherwin-Williams Company		Jun 06 2005	
		FIGURE #:	
		1	





RI/FS WORK PLAN

GIBBSBORO,
CLIENT NAME:

NEW JERSEY

THE SHERWIN-WILLIAMS COMPANY

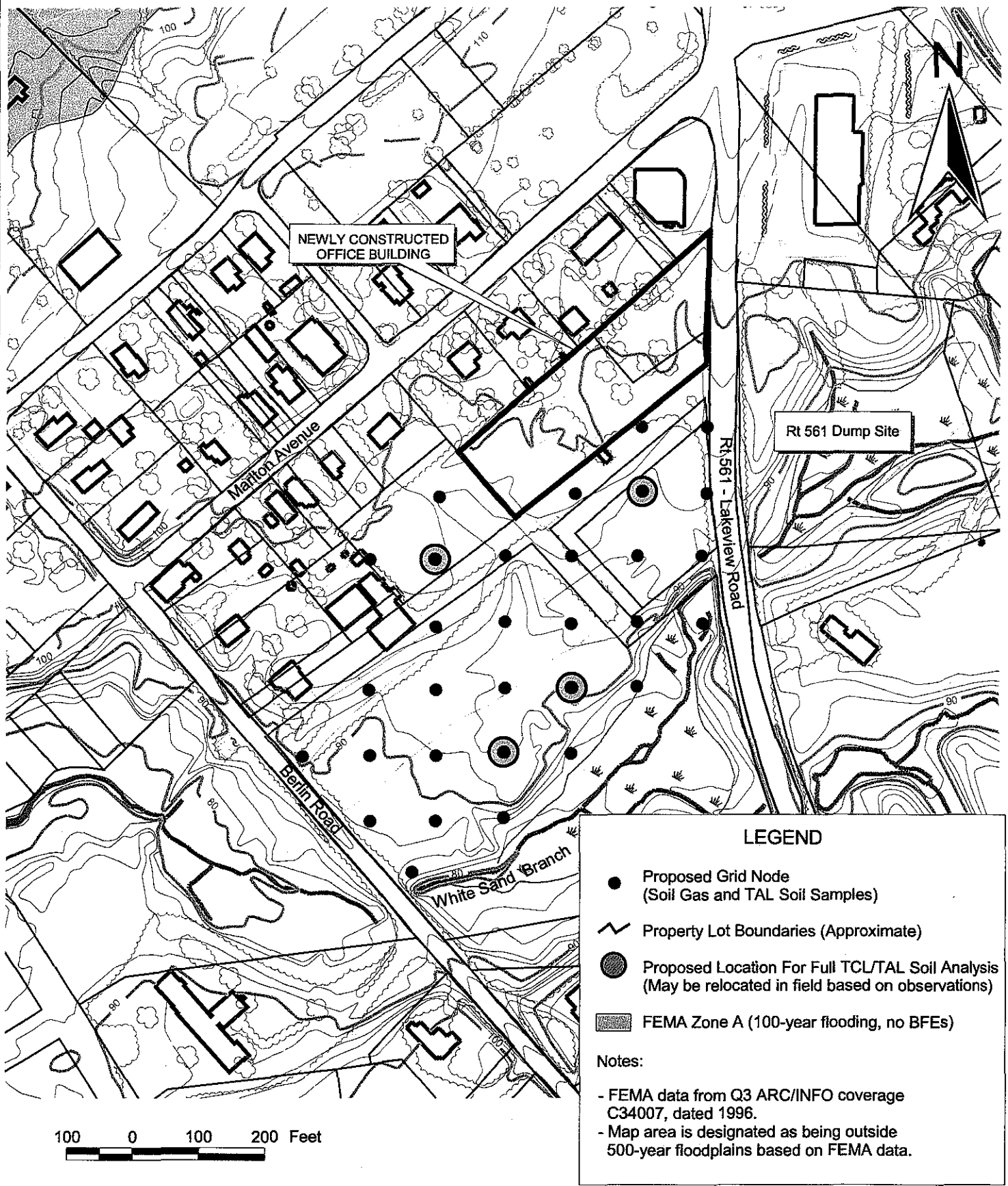
ROUTE 561 DUMP SITE STRATEGIC SAMPLING LOCATIONS

DATE:

04/21/2005

FIGURE #:

2



RI/FS WORK PLAN

GIBBSBORO,
CLIENT NAME:

NEW JERSEY

THE SHERWIN-WILLIAMS COMPANY

VACANT LOT SCREENING AND STRATEGIC SAMPLING LOCATIONS

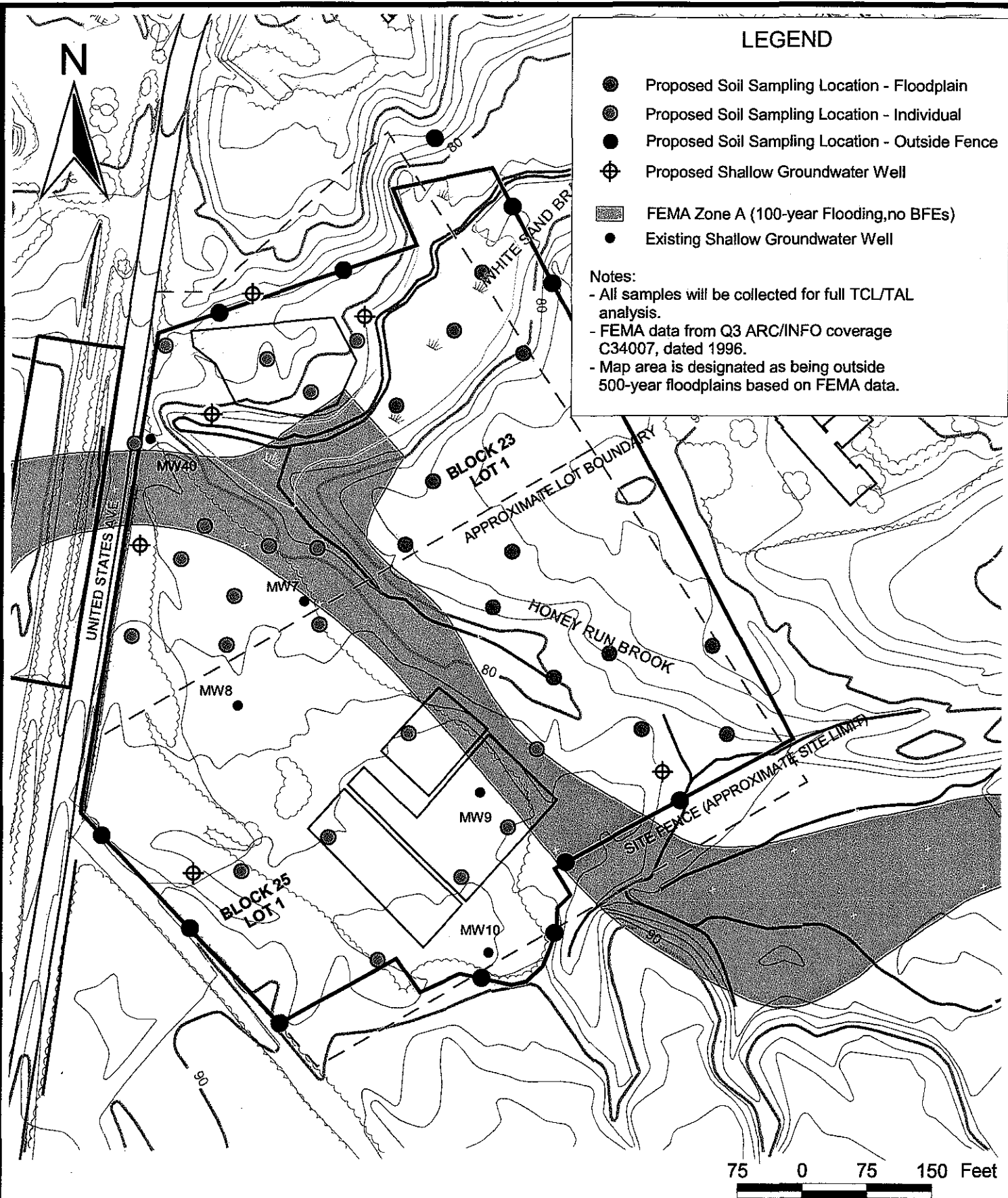
DATE:

04/27/2005

FIGURE #:

3

L:\SHERWIN\GIS\Apr10405StrategicSampling\01795burnsample.apr



RI/FS WORK PLAN

GIBBSBORO, NEW JERSEY

CLIENT NAME:

THE SHERWIN-WILLIAMS COMPANY

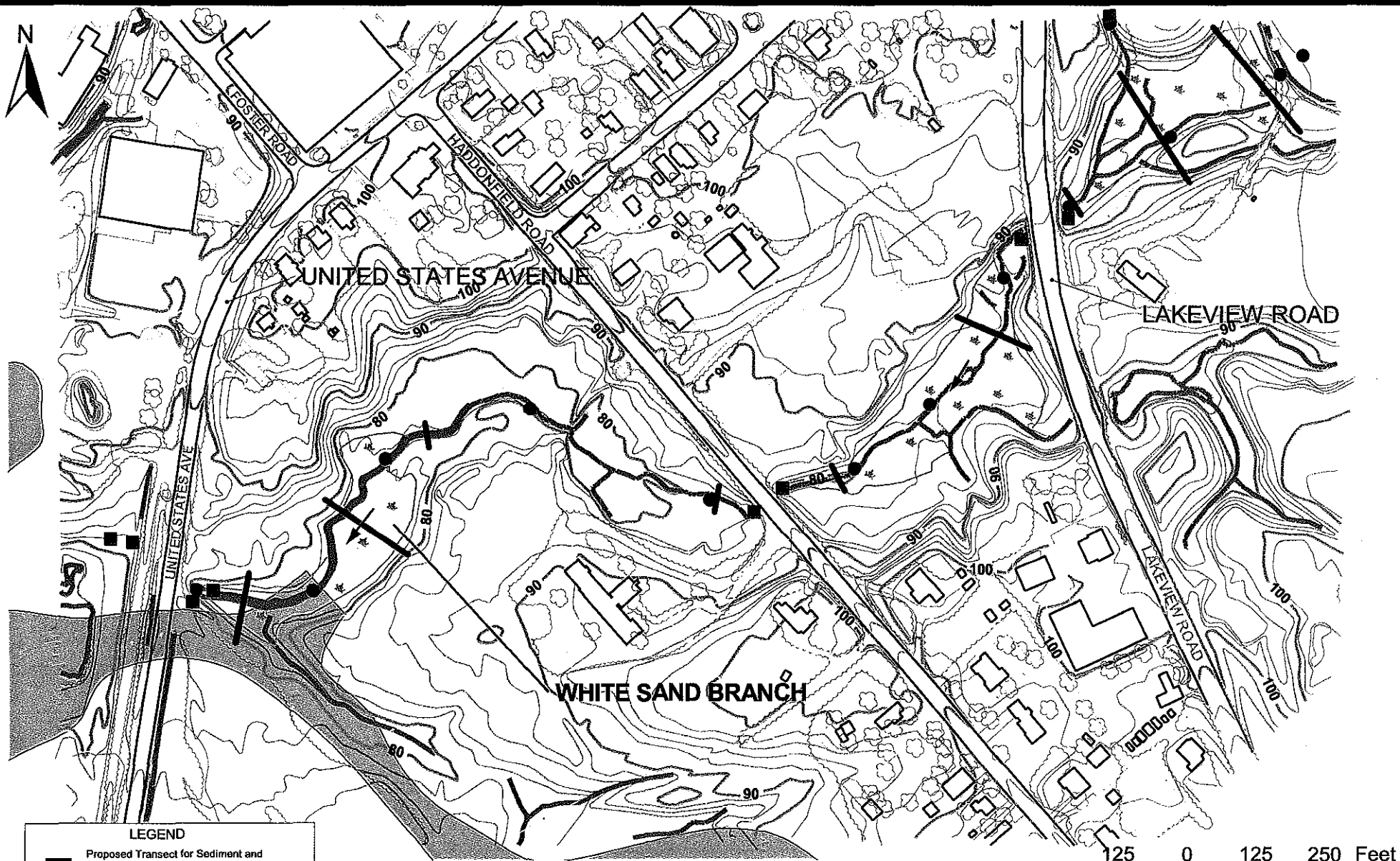
UNITED STATES AVENUE BURN SITE STRATEGIC SAMPLING LOCATIONS

DATE:

04/21/2005

FIGURE #:

4A



LEGEND

- Proposed Transect for Sediment and Soil Sampling Locations (per workplan)
- Proposed Surface Water Sampling Location
- Proposed Sediment Sampling Location
- ▨ FEMA Zone A (100-year flooding, no BFEs)

Notes:

- All samples will be collected for full TCL/TAL analysis.
- FEMA data from Q3 ARC/INFO coverage C34007, dated 1996
- Map area is designated as being outside 500-year floodplains based on FEMA data

125 0 125 250 Feet



RI/FS WORK PLAN

GIBBSBORO, NEW JERSEY
 CLIENT NAME:
 THE SHERWIN-WILLIAMS COMPANY

WHITE SAND BRANCH STRATEGIC SAMPLING LOCATIONS

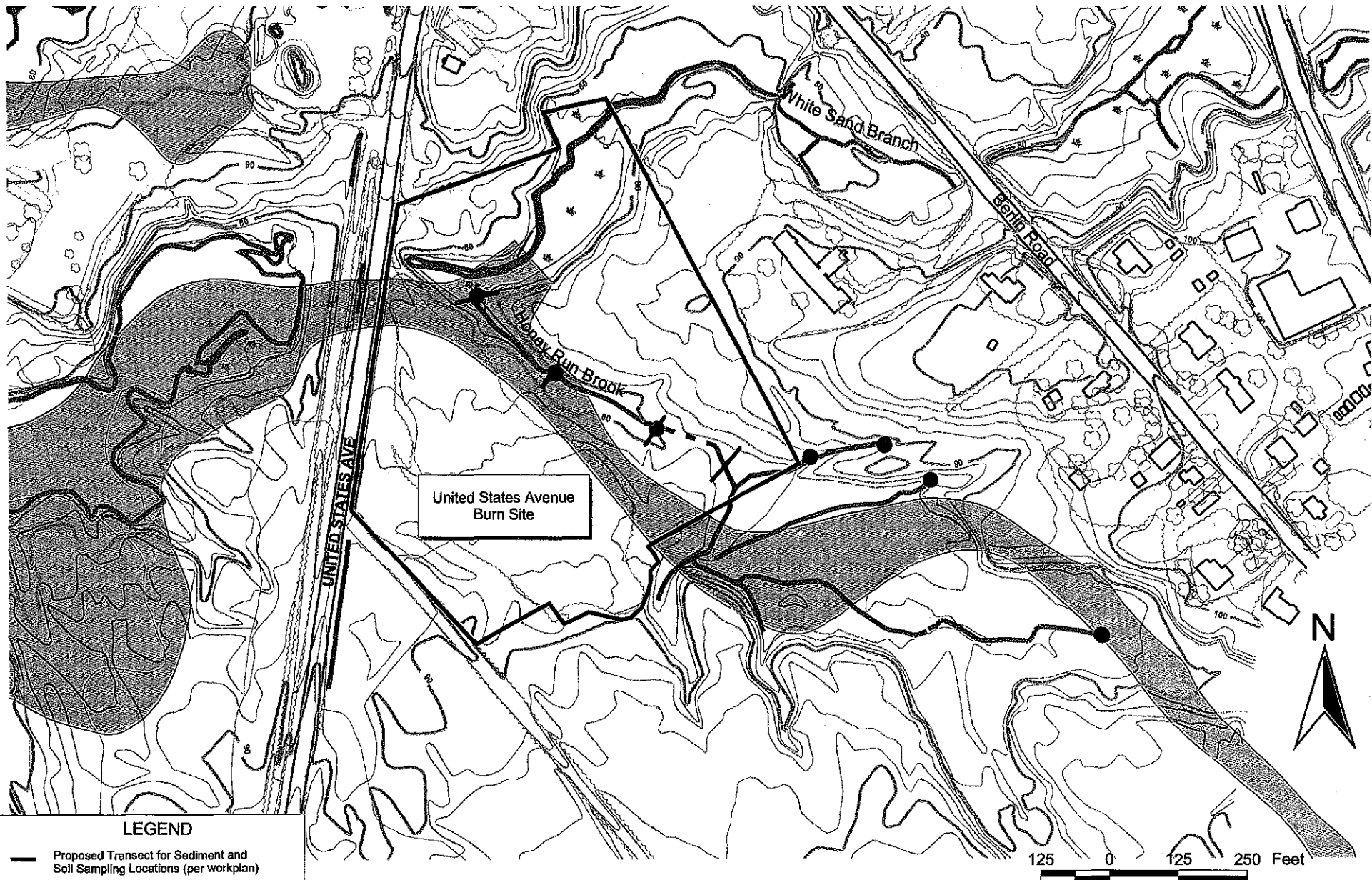
DATE:

04/21/2005

FIGURE #:

4B

L:\SHERWIN\GIS\Apr04\05StrategicSampling\01797honeyrunsample.apr



LEGEND

- Proposed Transect for Sediment and Soil Sampling Locations (per workplan)
- Proposed Surface Water Sampling Location
- FEMA Zone A (100-year flooding, no BFEs)

Notes:

- All samples will be collected for full TCL/TAL analysis.
- FEMA data from Q3 ARC/INFO coverage C34007, dated 1996
- Map area is designated as being outside 500-year floodplains based on FEMA data.



RI/FS WORK PLAN

GIBBSBORO,
CLIENT NAME:

NEW JERSEY

THE SHERWIN-WILLIAMS COMPANY

HONEY RUN BROOK STRATEGIC SAMPLING LOCATIONS

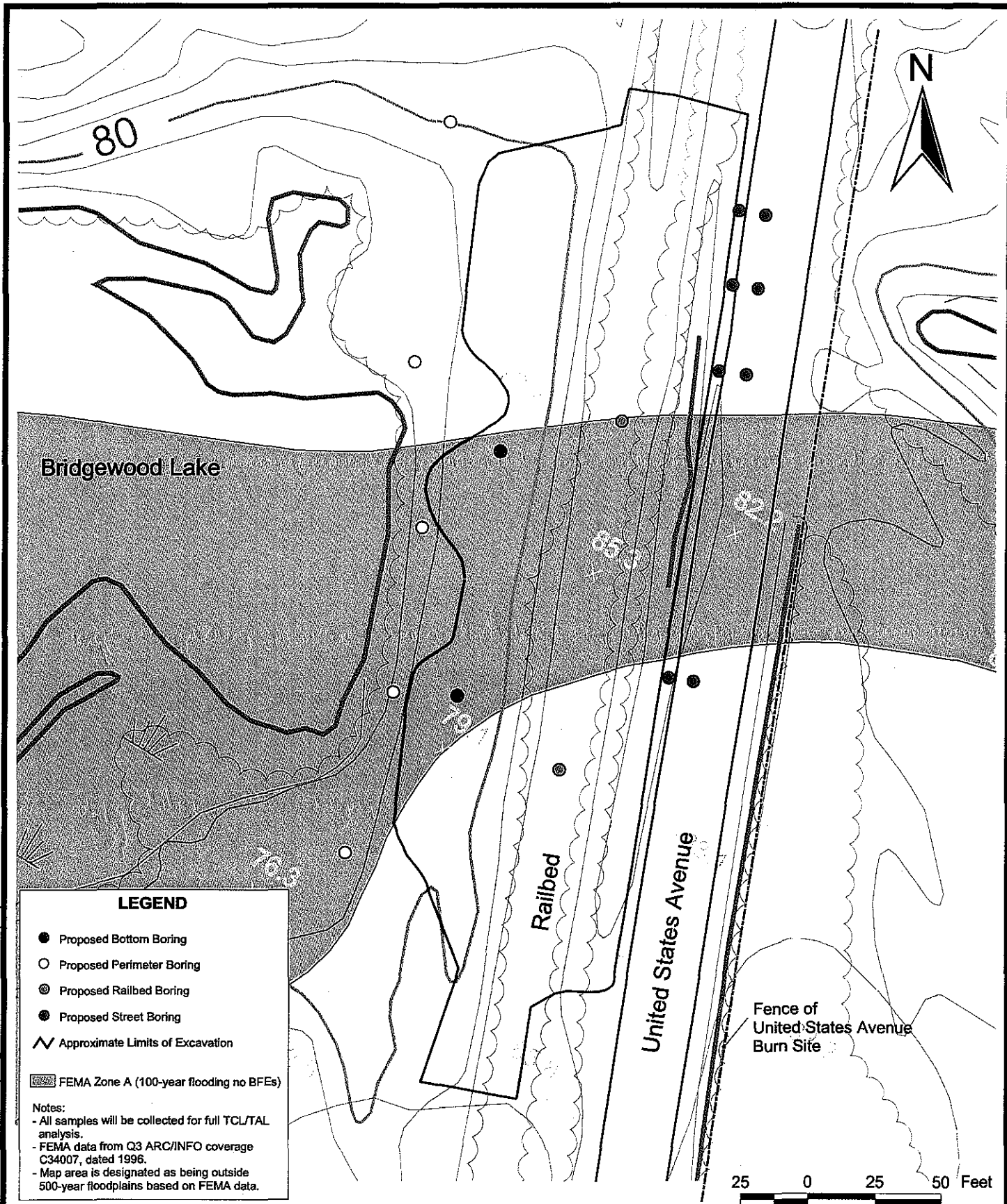
DATE:

04/21/2005

FIGURE #:

4C

L:\SHERWIN\GIS\Apr04\05StrategicSampling\01801railroadsamp.apr



RI/FS WORK PLAN

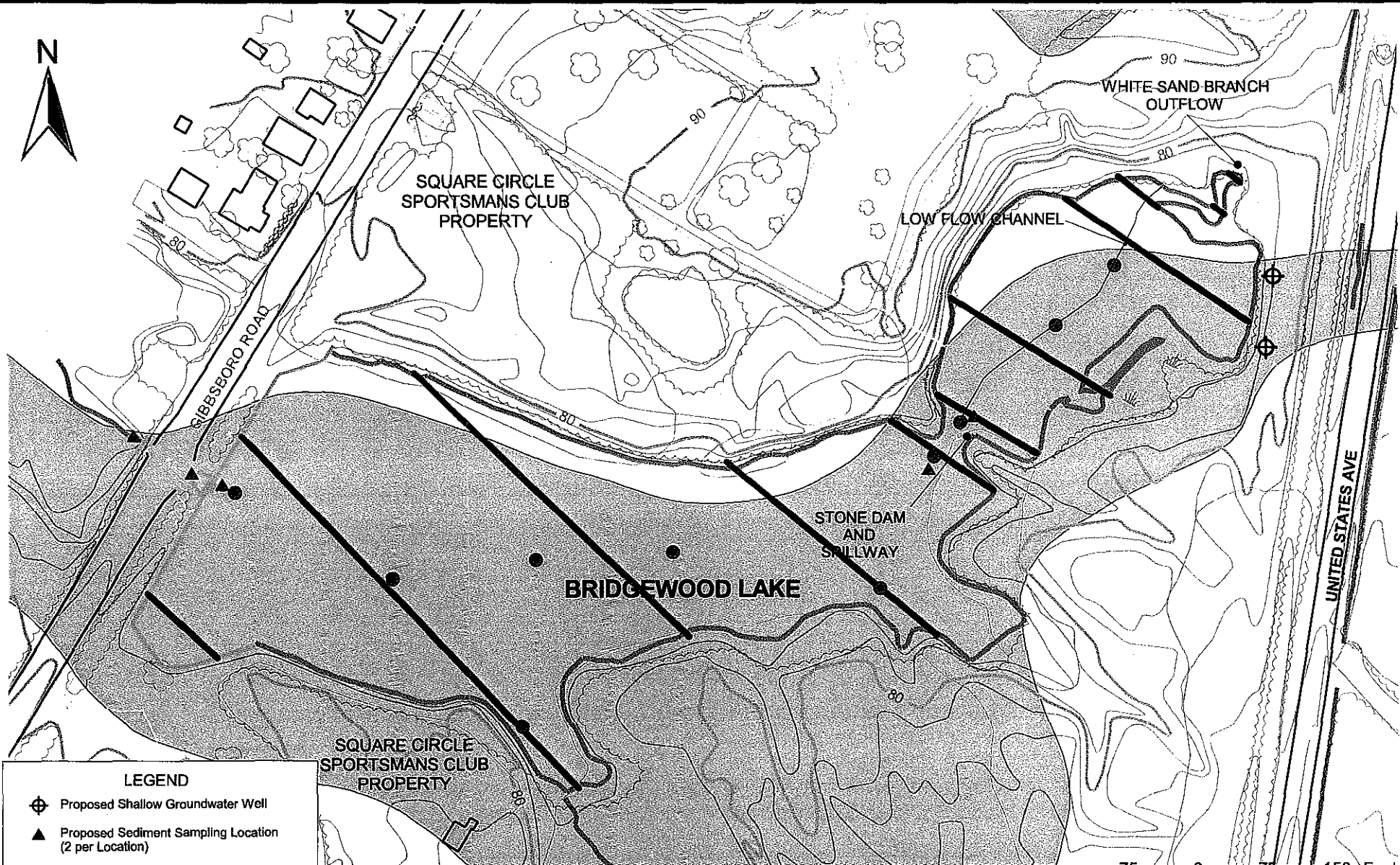
GIBBSBORO, NEW JERSEY
 CLIENT NAME:
 THE SHERWIN-WILLIAMS COMPANY

RAILROAD SITE STRATEGIC SAMPLING LOCATIONS






DATE:
 04/21/2005

FIGURE #:
 6

L:\SHERRWIN\GIS\A\0405\StrategicSampling\01799\bridgewoodsample.apr



LEGEND

-  Proposed Shallow Groundwater Well
-  Proposed Sediment Sampling Location (2 per Location)
-  Proposed Surface Water Sampling Location
-  Proposed Transect for Sediment and Soil Sampling Locations (per workplan)
-  FEMA Zone A (100-year Flooding, no BFEs)

Notes:

- All samples will be collected for full TCL/TAL analysis.
- FEMA data from Q3 ARC/INFO coverage C34007, dated 1996.
- Map area is designated as being outside 500-year floodplains based on FEMA data.

75 0 75 150 Feet



RI/FS WORK PLAN

GIBBSBORO,
CLIENT NAME:

NEW JERSEY

THE SHERWIN-WILLIAMS COMPANY

BRIDGEWOOD LAKE STRATEGIC SAMPLING LOCATIONS

DATE:

04/21/2005

FIGURE #:

7